

AO 91 (Rev. 11/11) Criminal Complaint

COPY

SEAL
UNITED STATES DISTRICT COURT
for the
Northern District of Texas

2019 JUL 31 PM 1:16

United States of America

v.

William Patrick Williams

Defendant(s)

Case No.

5 - 19MJ - 0123

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 11, 2019 in the county of Lubbock in the
Northern District of Texas, the defendant(s) violated:

Code Section

Title 18, United States Code,
Section 924(a)(1)(A)

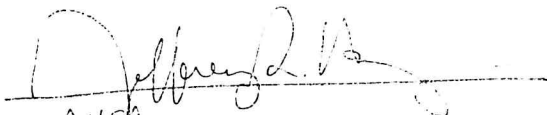
Offense Description

On or about July 11, 2019, in the Lubbock Division of the Northern District of Texas, and elsewhere, William Patrick Williams, defendant, did knowingly making a false statement and representation to Cabela's, a person licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of Cabela's, executed an ATF Form 4473 that listed his address was Lubbock, Texas, when, in truth and in fact, his address was Lubbock, Texas.

This criminal complaint is based on these facts:

see attached affidavit in support of complaint.

☒ Continued on the attached sheet.


AVSA


Complainant's signature
Jaclyn Yandell, ATF Special Agent
Printed name and title

Sworn to before me and signed in my presence.

Date: 7/31/19

City and state: Lubbock, Texas


Judge's signature
D. Gordon Bryant, Jr., U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Jaclyn K. Yandell, affiant herein, being duly sworn, state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), assigned to the Dallas Field Division, Lubbock Field Office. I have served with the ATF since 2015. I successfully completed the Criminal Investigator Basic Training Program at the Federal Law Enforcement Training Center (FLETC) and the Special Agent Basic Training Program at the ATF National Academy in Glynco, Georgia. I am an ATF certified Firearms Instructor and successfully completed the Firearms Instructor Training Program at FLETC Cheltenham, Maryland, in May 2016. I am an ATF Interstate Nexus Expert and successfully completed the Interstate Nexus Expert Training Program at the National Center for Explosives Training and Research in Huntsville, Alabama, in August 2018. Before that, I was employed with the Federal Air Marshal Service for over five years. I have earned a Bachelor of Sciences degree in Criminal Justice from the University of North Texas in Denton, Texas.

This affidavit is made in support of a complaint and arrest warrant for William Patrick Williams. I am familiar with the information contained in this affidavit based upon my own personal investigation, as well as conversations with other law enforcement officers involved in this investigation. Because this affidavit is submitted for the limited purpose of obtaining an arrest warrant, it does not contain every fact and circumstance uncovered during the course of the investigation.

Title 18, United States Code, Section 924(a)(1)(A) makes it a crime for anyone to

knowingly make a false statement during the purchase of a firearm. To prove this offense, the Government must show: (1) the defendant knowingly made a false statement or representation; (2) The defendant made the statement or representation to a licensed dealer, importer, manufacturer or collector of firearms, within the meaning of Chapter 44, Title 18, United States Code; and (3) the statement pertained to information that the law requires the licensed dealer, importer, manufacturer or collector to keep.

On July 13, 2019, Lubbock Police Department (LPD) Officers were informed that William Patrick Williams was admitted to Covenant Medical Center for psychiatric assessment after making threats to commit a mass shooting. Williams stated that he had recently purchased an AK-47-style rifle and was wanting to “shoot up” his hotel and then commit suicide by cop when the police arrived.

Williams’s grandmother stated that she received a phone call from Williams and in that phone call he said that he was homicidal and suicidal. The grandmother could hear Williams manipulating a firearm over the phone and was able to convince Williams to let her pick him up and take him to the hospital.

Williams later told officers that he was staying in room #230 at the located at Lubbock, Texas. Williams gave officers consent to enter the hotel room. Williams said that he laid out all his weapons on the bed for law enforcement to take custody of the items.

Inside the room, LPD officers found an AK-47 rifle, seventeen magazines loaded with 7.62 ammunition, a black trench coat, multiple knives, black tactical pants, a black t-shirt that said “Let ‘Em Come”, and black tactical gloves with the fingers cut off. In a

bag, officers found documents chronicling Williams's depression disorder and anti-depressant medication.

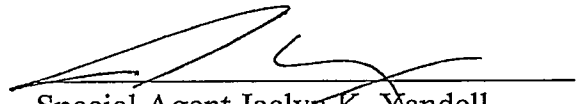
On July 22, 2019, ATF received the ATF Form 4473 that Williams completed on July 11, 2019, when purchasing the AK-47 at Cabela's, a Federal Firearm Licensee. On that ATF Form 4473, Williams stated that his address was Lubbock, Texas, which matches the address on Williams's Texas Driver's License. However, Williams was actually residing at Lubbock, Texas.

On July 26, 2019, Federal Bureau of Investigation (FBI) special agents interviewed Prudence Venner, who also resides at and is Williams's roommate. Venner said that Williams had been residing at since approximately May 11, 2019. On June 6, 2019, Williams filled out the application with the apartment complex and gave a money order so he could be added to the lease agreement. Special Agents discovered that the apartment complex never finalized adding Williams to the lease. Venner stated that she and Williams had believed that Williams had been added to the lease as that was a condition for Williams to stay at the apartment.

On July 30, 2019, myself and an FBI special agent interviewed Williams's aunt and uncle at their residence, Lubbock, Texas. This is the address that Williams listed on the Form 4473 that he completed on July 11, 2019. The uncle advised agents that Williams had not lived with them since at least mid-June. The uncle had difficulty recalling the exact date, but remembered that it coincided with their

vacation and that the uncle did not want Williams at the house alone because Williams had weapons. The uncle stated that he and Williams had a fight and Williams was told to move out. The uncle said that after Williams moved out, he and the aunt changed the alarm code and took Williams's key to the house. According to the uncle, Williams still had mail and medication delivered to the house, but he no longer had access to the residence.

Based on my training, education, and experience, and the information provided to me, I believe that William Patrick Williams violated Title 18, United States Code, Section 924(a)(1)(A), by knowingly making a false statement to a Federal Firearms Licensee during the purchase of a firearm. That is, Williams stated that his address on July 11, 2019, was _____ when, in truth and in fact, as Williams then knew, his address was _____


Special Agent Jaclyn K. Yandell
Bureau of Alcohol, Tobacco, Firearms,
and Explosives

Subscribed and sworn before me this 31st day of July 2019.

A handwritten signature in black ink, appearing to read 'D. Bryant', written over a horizontal line.

D. GORDON BRYANT, JR.
UNITED STATES MAGISTRATE JUDGE